## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

| CELANESE CORPORATION,      | § |                                  |
|----------------------------|---|----------------------------------|
|                            | § |                                  |
| Plaintiff,                 | § |                                  |
|                            | § |                                  |
| V.                         | § | Civil Action No. 3:15-cv-03822-G |
|                            | § |                                  |
| ONEBEACON AMERICA          | § |                                  |
| INSURANCE COMPANY AND      | § |                                  |
| RESOLUTE MANAGEMENT, INC., | § |                                  |
|                            | § |                                  |
| Defendants.                | § |                                  |
|                            | § |                                  |

## **STIPULATION OF DISMISSAL**

IT IS HEREBY STIPULATED by and between the parties to this action through their designated counsel that the above-captioned action be and hereby is dismissed *without prejudice* pursuant to Rule 41(a)(1)(A)(ii).

Date: January 9, 2017 Respectfully submitted,

By: /s/Michael John Miguel
Michael John Miguel (pro hac vice)
Brett D. Bissett (pro hac vice)
MCKOOL SMITH, P.C.
300 South Grand Ave., Suite 2900
Los Angeles, CA 90071
Tel: (213) 694-1200
Fax: (213) 694-1234
mmiguel@mckoolsmithhennigan.com

mmiguel@mckoolsmithhennigan.com bbissett@mckoolsmithhennigan.com

Lacy M. Lawrence
Texas State Bar No. 24055913
AKIN GUMP STRAUSS HAUER & FELD LLP
1700 Pacific Avenue, Ste. 4100
Dallas, Texas 75201
Tel: (214) 969-2800
Fax: (214) 969-4343
llawrence@akingump.com

ATTORNEYS FOR PLAINTIFF CELANESE CORPORATION

By: /s/Robert Hoffman

Robert M. Hoffman State Bar No. 09788200 ANDREWS KURTH LLP

1717 Main Street, Suite 3700

Dallas, Texas 75201 Tel: (214) 659-4653 Fax: (214) 915-1483

robhoffman@ansdrewskurth.com

Kevin J. O'Connor (*pro hac vice*) John R. Felice (*pro hac vice*)

HERMES NETBURN O'CONNOR & SPEARING,

P.C.

265 Franklin Street, 7th Floor

Boston, MA 02110 Tel: (617) 728-0050 Fax: (617) 728-0052

koconnor@hermesnetburn.com jfelice@hermesnetburn.com

## ATTORNEYS FOR DEFENDANT ONEBEACON AMERICA INSURANCE COMPANY

By: /s/D. Patrick Long
D. Patrick Long (Texas Bar No. 12515500)
SQUIRE PATTON BOGGS (US) LLP
2000 McKinney Ave., Suite 1700
Dallas, Texas 75201

Tel: (214) 758-1500 Fax: (214) 758-1550 patrick.long@squirepb.com

Amanda D. Price (Texas Bar No. 24060935) SQUIRE PATTON BOGGS (US) LLP 6200 Chase Tower

600 Travis Street Houston, Texas 77002 Tel: (713) 546-5850

Fax: (713) 546-5830

amanda.price@squirepb.com

John M. Nonna (*pro hac vice*) Suman Chakraborty (*pro hac vice*) 30 Rockefeller Plaza, 23rd Floor New York, New York 10112

Tel: (212) 872-9800 Fax: (212) 872-9815 john.nonna@squirepb.com

suman.chakraborty@squirepb.com

ATTORNEYS FOR DEFENDANT RESOLUTE MANAGEMENT, INC.

## **CERTIFICATE OF SERVICE**

On January 9, 2017 electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5 (b)(2).

<u>/s/Michael John Miguel</u>
Michael John Miguel